

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF NEBRASKA

IN RE:

STEPHANIE OSBORN and
COLTON OSBORN, et al.

Debtors.

Case No. BK 24-40202-BSK
(Chapter 12)

(JOINTLY ADMINISTARTED)

OBJECTION TO SECOND AMENDED PLAN

COMES NOW Reinke Manufacturing Co., Inc. ("Reinke"), and Objects to the Confirmation of the Debtors' Second Amended Plan (Doc. 261). (the "Plan"). In support of this request, Reinke states as follows:

1. On April 30, 2024, Reinke filed its Proof of Claim (Claim. No. 15) which asserted a claim in the amount of \$398,842.03 on the Equipment Finance Agreements attached thereto as **Exhibits A and C**, which includes late charges of \$3,254.83, together with interest accruing on the Equipment Finance Agreements attached thereto as **Exhibits A and C** at the rates of 6.45% and 6.42% respectively. In addition, Reinke asserted the right to collect its attorneys' fees.

2. The Debtors have not objected to Reinke's Proof of Claim and the claim is an allowed secured claim.

3. The Plan fails to provide for the payment of post-petition interest to Reinke.

4. The Plan assumes that the Debtors will sell two (2) irrigation pivots financed by Reinke (the "Pivots"). While Reinke supports the pending motion to sell the Pivots, the Debtors have been unable to obtain an order authorizing the sale of the Pivots.

5. The Plan proposes an annual payment to Reinke that is insufficient to pay Reinke's allowed secured claim in full.

6. Reinke reserves the right to supplement this Objection.

WHEREFORE, Reinke respectfully requests that the Court deny confirmation of the Plan.

REINKE MANUFACTURING CO., INC.

By: /s/ Richard P. Garden, Jr.
Richard P. Garden, Jr. - #17685
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CERTIFICATE OF SERVICE

I hereby certify that on March 31, 2025, I electronically filed the foregoing document with the Clerk of the Court using the CM/ECF system which sent notification of said filing to all CM/ECF participants.

/s/ Richard P. Garden, Jr.
Richard P. Garden, Jr.